

# Federal Defenders OF NEW YORK, INC.

Southern District  
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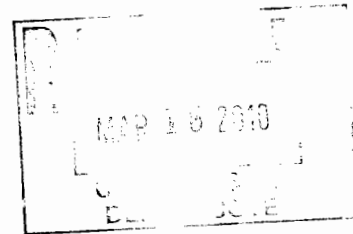
Leonard F. Joy  
Executive Director and  
Attorney-in-Chief

Southern District of New York  
John J. Byrnes  
Attorney-in-Charge

March 18, 2010

**BY HAND DELIVERY**

Honorable Denise Cote  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007



**Re: United States v. Sergey Aleynikov**  
**10 Cr. 96 (DLC)**

The Honorable Denise L. Cote:

I write to supplement my earlier letter to the Court regarding Mr. Aleynikov's travel. The government's consent to our request was based on our office providing them (both AUSA Rohr and USPTSO Khilkevich) with proof that Mr. Aleynikov's stepfather had been deathly ill with cancer and was in a hospice care facility, and proof of his demise. The government consented to only a short period of travel and asked Mr. Aleynikov to provide proof of a round-trip ticket. That documentation was provided to AUSA Rohr yesterday. Finally, the government asked Mr. Aleynikov to surrender his wife and children's passports prior to travel. His youngest daughter does not have a passport, as she is only one and a half years old. Mr. Aleynikov has complied with this condition by providing the passports to my office. I will provide them to AUSA Rohr by 4:00 p.m. today.

Thank you for your consideration in this matter.

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Respectfully submitted,

Sabrina P. Shroff  
Assistant Federal Defender  
Tel.: (212) 417-8713

SO ORDERED:

HON. DENISE L. COTE

United States District Judge

*March 18, 2010*

cc: AUSA Rohr & USPTSO Khilkevich